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CLERK US DISTRICT COURT
DISTRICT OF ARIZONA

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CR19-00915 TUC-JGZ(EJM)

IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF ARIZONA

United States of America,

Plaintiff,

vs.

Erica Roxanne Baca,
Counts 2, 3;

Leonel Alonso Medina,
Count 1;

Defendants.

INDICTMENT

Violations:

18 U.S.C. §§ 922(a)(6) and 924(a)(2)
(False Statements in Connection with
Acquisition of Firearm)
Counts 1, 2

18 U.S.C. §§ 924(a)(1)(A) and 924(a)(2)
(False Statements in Federal Firearms
Licensee Records)
Count 3

THE GRAND JURY CHARGES:

COUNT 1

On or about August 9, 2018, at or near Tucson, in the District of Arizona, LEONEL ALONSO MEDINA, in connection with the acquisition of firearms, that is, one Del-Ton Incorporated model DTI15 5.56mm rifle and one DPMS Panther Arms 5.56mm rifle, from USA Pawn & Jewelry, a licensed dealer of firearms within the meaning of Chapter 44, Title 18, United States Code; did knowingly make a false and fictitious written statement to USA Pawn & Jewelry, which statement was intended to deceive USA Pawn & Jewelry as to a fact material to the lawfulness of such sale of said firearms to LEONEL ALONSO MEDINA under Chapter 44, Title 18, United States Code; in that LEONEL ALONSO MEDINA stated that he was the actual transferee/buyer of said firearms, when in fact he

1 was purchasing them on behalf of another individual; in violation of Title 18, United States
2 Code, Sections 922(a)(6) and 924(a)(2).

3 **COUNT 2**

4 On or about September 9, 2018, at or near Phoenix, in the District of Arizona,
5 ERICA ROXANNE BACA, in connection with the acquisition of firearms, that is, two
6 Del-Ton model DTI15 5.56mm rifles, from Against All Enemies, L.L.C., doing business
7 as A.A.E./All Enemies Arsenal, a licensed dealer of firearms within the meaning of Chapter
8 44, Title 18, United States Code; did knowingly make a false and fictitious written
9 statement to Against All Enemies, L.L.C., which statement was intended to deceive All
10 Enemies, L.L.C. as to a fact material to the lawfulness of such sale of said firearms to
11 ERICA ROXANNE BACA under Chapter 44, Title 18, United States Code; in that ERICA
12 ROXANNE BACA stated that she was the actual transferee/buyer of said firearms, when
13 in fact she was purchasing them on behalf of another individual; in violation of Title 18,
14 United States Code, Sections 922(a)(6) and 924(a)(2).

15 **COUNT 3**

16 On or about September 9, 2018, at or near Phoenix, in the District of Arizona,
17 ERICA ROXANNE BACA knowingly made a false statement and representation to
18 Against All Enemies, L.L.C., doing business as A.A.E./All Enemies Arsenal, a firearms
19 dealer licensed under the provisions of Chapter 44, Title 18, United States Code, with
20 respect to information required by the provisions of Chapter 44, Title 18, United States
21 Code, to be kept in the records of Against All Enemies, L.L.C., in that ERICA ROXANNE
22 BACA, in connection with the purchase of firearms, that is, two Del-Ton model DTI15
23 5.56mm rifles, stated that her current address was 401 W. Iowa St., Tucson, Arizona, when
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1 this was not in fact her current address; in violation of Title 18, United States Code, Section
2 924(a)(1)(A).

3
4 A TRUE BILL

5 **/s/**

6 Presiding Juror

7 ELIZABETH A. STRANGE
8 First Assistant United States Attorney
9 District of Arizona

10 **/s/**

11 Assistant United States Attorney

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**REDACTED FOR
PUBLIC DISCLOSURE**

Dated: April 3, 2019